

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Application by BellSouth Corporation,
BellSouth Telecommunications, Inc., and
BellSouth Long Distance, Inc., for
Provision of In-Region, InterLATA
Services in Louisiana

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**REPLY COMMENTS OF AMERITECH ON SECOND
APPLICATION BY BELL SOUTH TO PROVIDE
IN-REGION, INTERLATA SERVICES IN LOUISIANA**

Kelly R. Welsh
John T. Lenahan
AMERITECH CORPORATION
30 South Wacker Drive
Chicago, IL 60606
(312) 750-5000

Theodore A. Livingston
John E. Muench
Christian F. Binnig
MAYER, BROWN & PLATT
190 South LaSalle Street
Chicago, IL 60603
(312) 782-0600

COUNSEL FOR AMERITECH

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CC Docket No. 98-121

**REPLY COMMENTS OF AMERITECH ON SECOND
APPLICATION BY BELL SOUTH TO PROVIDE
IN REGION, INTERLATA SERVICES IN LOUISIANA**

Ameritech Corporation ("Ameritech") hereby submits these Reply Comments in support of BellSouth's second application for in-region, interLATA authority in Louisiana under Section 271 of the Telecommunications Act of 1996 (the "Act"). These Reply Comments address several of the positions taken by the Department of Justice ("DOJ").

INTRODUCTION AND SUMMARY

At a track meet, in the high jump pit, the bar is raised with each successive try. That, however, is not the congressional design for the Section 271 application process. Yet, this is precisely the approach taken by the United States Department of Justice ("DOJ") in its comments on BellSouth's Second Application To Provide In-Region, InterLATA Services in Louisiana. Through the 1996 Telecommunications Act, Congress enacted a "pro-competitive, deregulatory" national telecommunications policy. The DOJ's evaluation is just the opposite. The DOJ's evaluation of BellSouth's application reflects microregulation, seemingly designed to

maintain and fortify the barriers to BOC entry into the oligopolistic long distance market, rather than the "pro-competitive, deregulatory" approach of the 1996 Act.

The DOJ ducks statutory issues that would promote and facilitate BOC entry under Track A, such as the important issue of whether PCS providers satisfy the requirements of Section 271(c)(1)(A). As Ameritech's August 4, 1998 comments demonstrate, PCS clearly falls within the statutory definition of "telephone exchange service." The DOJ also openly second guesses pricing decisions that have been made by the Louisiana Public Service Commission, without even addressing, let alone following, the mandate order issued by the Eighth Circuit Court of Appeals. See Iowa Utilities Board, et al. v. FCC, 135 F.3d 535 (8th Cir. 1998). The Commission, of course, is required to comply with the Eighth Circuit's pricing mandate.

An even more disturbing aspect of the DOJ's evaluation, however, is its microregulatory approach to technical operational issues (issues which are outside of the DOJ's traditional area of expertise). With respect to these issues, Ameritech, of course, agrees that access to operational support systems is a necessary component of checklist compliance. But the DOJ's microscopic standards appear to make the "passing grade" an unattainable goal of perfection. For example, the DOJ has "serious concerns" regarding electronic "flow through." BellSouth apparently achieved a region-wide flow through rate of 82% for CLEC orders (residential and business aggregated) compared to BellSouth's own regionwide flow through rates of 96% for residential and 83% for business. The DOJ criticizes this excellent OSS performance as "substantially below" required performance. Likewise, with respect to end-to-end performance, the DOJ has concerns with BellSouth's average installation interval performance, even though the performance for business resale orders was 1.16 days, compared to 1.29 days for BellSouth's

own business orders. If these performance results raise “serious concerns” to the DOJ, then the DOJ is effectively raising the bar to a height that may never be cleared.

In addition to the DOJ’s unrealistic approach to assessing BellSouth’s actual commercial usage performance, the DOJ’s evaluation regarding external testing evidence is equally troublesome. The DOJ apparently believes that external testing requires, at a minimum, master test plans that are at least 500 pages in length, subject to industry review and divorced from commercial reality. The DOJ also continues to suggest a number of performance measurements, such as jeopardy notices, that are unnecessary and counterproductive. In fact, the overwhelming evidence now before the Commission in its Performance Measurement NPRM supports the fact that numerous performance-related issues advanced by the DOJ should not be mandated. For example, the DOJ’s apparent belief, without any reason, support or discussion, that statewide performance results are inadequate, but rather must be geographically deaveraged, is belied by the record in the Commission’s NPRM.

Perhaps most significant, however, is the DOJ’s refusal to follow the plain terms of the Act in connection with the appropriate manner of obtaining access to unbundled network elements. For this reason, the remainder of these comments focuses on the DOJ’s argument that BellSouth’s proposed method for permitting competing local exchange carriers (“CLECs”) to obtain access to and combine network elements at BellSouth’s premises — i.e., collocation — is at odds with the Act, too expensive, too burdensome, takes too long, and is inadequate to spur competitive entry in the local exchange market.

As we explain below, it is the DOJ — and the commentators with whom it has aligned itself (primarily AT&T and MCI) — that are at odds with the Act. Moreover, the DOJ and its

allies are at odds with the judgment of Congress regarding what is appropriate and what is adequate to accomplish the intended end: a level playing field in a local exchange market. Congress decided that collocation is both (i) an appropriate method for obtaining access to and combining network elements at the premises of the incumbent and (ii) the only method that the Commission is authorized to mandate. The Commission (or any governmental agency) is not at liberty to disregard this statutory limitation and the pragmatic judgment that it incorporates, the entreaties of the DOJ, AT&T and MCI notwithstanding.^{1/}

I. Congress Expressly Determined That Collocation Is An Appropriate Method For Obtaining Access To And Combining Network Elements At The Incumbent's Premises

In a subsection of the Act which the DOJ neglects to even mention, Section 251(c)(6), Congress required incumbents to provide "physical collocation of equipment necessary for . . . access to unbundled network elements at the premises of the local exchange carrier." 47 U.S.C. § 251(c)(6). Thus, Congress clearly determined that collocation was appropriate; indeed, Congress required it. Accordingly, BellSouth and other incumbents can hardly be faulted for making it available. Far from determining that collocation was an impediment to competition, Congress clearly believed that collocation was reasonably necessary in order adequately to promote competition.

In addition to ignoring the statutory scheme, the DOJ's evaluation seems to imply that collocation could never be an adequate method to provide access to unbundled network

^{1/} Notwithstanding the DOJ's skewed approach, it is worth noting that the DOJ has not objected to the position advanced by BellSouth, and supported by Ameritech, that Internet traffic is not subject to reciprocal compensation. Some CLECs, however, have claimed otherwise and asserted that failure to pay such reciprocal compensation precludes checklist compliance. For the reasons stated in Ameritech's August 4, 1998 comments regarding this issue, those CLECs' position is untenable and clearly wrong.

elements. The DOJ is again wrong. Recently, Ameritech conducted an internal demonstration in Chicago, Illinois using physical and virtual collocation to combine unbundled network elements. The demonstration allowed for the testing of live traffic over an alternate network made up of unbundled network elements accessed through collocation. This experience validated that a requesting carrier could access unbundled network elements through collocation and combine such elements to create a fully functional alternate telecommunications network of its own. The approach taken was to duplicate the necessary steps a requesting carrier would take to combine unbundled network elements where access was provided using collocation, both physical and virtual. The demonstration validated that unbundled network elements can be combined by a requesting carrier using its own equipment and personnel when such access is obtained using collocation.^{2/}

II. Collocation Is The Only Method That The Commission Has Authority To Require For Obtaining Access To And Combining Elements At The Incumbent's Premises

The DOJ, apparently taking its cue from AT&T, suggests two alternative methods for accessing and combining network elements at the incumbent's premises:

- "Direct access" — i.e., permitting the CLEC's technician to enter the central office, occupy that office at the frame, and physically affix a cross-connect that combines or connects a loop and a line port.
- "Electronic access" — i.e., remote "separating" and "combining" the loop and the switch through an electronic process.

^{2/} This demonstration is more fully described in a videotape and written presentation, "Ameritech's View of Access to Unbundled Network Elements at the Incumbent's Premises" presented at the Common Carrier Bureau's June 4, 1998 forum on combination of unbundled network elements. (See Public Notice, DA 98-1016).

As we explain below, neither is authorized or permitted by the Act. The DOJ's "direct access" position is in direct conflict with the 1996 Act and controlling case law. And the DOJ's "electronic access" theory is just another method for improperly obtaining "already combined elements at cost . . . [which would thereby] obliterate the careful distinctions Congress has drawn in subsections 251(c)(3) and (4) Iowa Utilities Board, 120 F.3d at 813. In short, both of the alternative methods suggested by the DOJ are prohibited by law.

A. Direct Access Is Not Authorized By The Act

In Bell Atlantic v. FCC, 24 F.3d 1441, 1446-47 (D.C. Cir. 1994), the Court held that absent clear, express statutory authorization, the Commission does not have the power to require "physical occupation [by a CLEC] of a section of the LEC's central offices." When it enacted Section 251, Congress provided this clear, express statutory authorization: Section 251(c)(6), which authorizes and requires "physical collocation." That, however, is the only "physical occupation" expressly authorized by the Act. Accordingly, under the Bell Atlantic decision, the Commission may not impose any method or type of "physical occupation" other than "physical collocation" (and, in certain circumstances, "virtual collocation"). "Direct access" is clearly another method or type of "physical occupation": The CLEC technician occupies, at least for a time, "a section of the LEC's central office" at the frame and outside the collocation space; moreover, the cross-connect he/she places on the frame is the CLEC's equipment, and that equipment physically occupies "a section of the LEC's central office" that is outside the collocation space on an exclusive and ongoing (i.e., permanent) basis. Bell Atlantic thus squarely prohibits the imposition of "direct access."^{3/}

^{3/} The Commission's own rules recognize that "direct access" is not permitted. First, collocation is the only method expressly authorized by those rules for obtaining physical

B. “Electronic Access” Is A Fiction That Violates Section 251(c)(3)

As we understand it, the remote “electronic access” process proposed by AT&T (and apparently endorsed by the DOJ) works as follows:

- The loop and the switch stay physically connected and combined at all times.
- At the time the customer changes from the incumbent to the CLEC, the incumbent, operating at a remote computer terminal, electronically “deactivates” the line, and the CLEC, operating at a similar remote computer terminal, subsequently “activates” it.
- The theory is that the electronic “deactivation” constitutes a separation of the two elements and that the subsequent electronic “activation” constitutes a “combining” of the two by the CLEC.

This form of “access” is a fiction that flatly violates the Eighth Circuit’s decision in Iowa Utilities Board (Iowa Utilities Board, et al. v. FCC, 120 F.3d 753, 812-13 (8th Cir. 1997), cert. granted, 118 S. Ct..879 (1998)), and Section 251(c)(3). Under the Eighth Circuit’s decision, the incumbent is required only to provide access to network elements on an “unbundled basis,” which the Eighth Circuit defined as physically separated from other elements. The Eighth Circuit made crystal clear that Section 251(c)(3) does not permit the Commission to require that incumbents provide “bundled,” or combined, access to their network elements. That is,

access at the incumbent’s premises. See 47 C.F.R. § 51.321(b)(1). Second, those rules expressly prohibit any other method or type of “physical occupation.” See id. § 51.323(h)(2) (stating that “an incumbent LEC is not required to permit collocating telecommunications carriers to place their own connecting transmission facilities within the incumbent LEC’s premises outside of the actual physical collocation space”). The CLEC’s cross-connect at the frame obviously is its own “connecting transmission facilit[y],” and it is within the incumbent’s premises “outside of the actual physical collocation space.”

Section 251(c)(3) does not permit the FCC to require incumbents to provide platforms of two or more elements physically combined. But that is precisely what AT&T's "electronic access" would entail: the loop and the switch would be provided as a preassembled, existing combination; they would never be physically separated from one another. Indeed, AT&T's supposed "deactivation" of the line would be, in reality, nothing more than a change to the end-user's billing records. Thus, AT&T's "electronic access" would violate Section 251(c)(3).

There is another, even more fundamental flaw with this "electronic access" proposal. On the trunk side, it is not possible to disconnect or "deactivate," electronically or otherwise, the connection between the switch and the interoffice transport network when a customer changes from the incumbent to a CLEC. As the Commission itself has acknowledged (see Third Reconsideration Order, ¶¶42, 44),^{4/} any such "deactivation" would disrupt service to potentially all other customers served by the incumbent's network and in effect cause that network to crash. Accordingly, in the case of network element combinations that can be accessed at the central office other than the loop-and-switch combination (e.g. in particular, the switch and interoffice transport combination), even the fictional "separating" and "combining" posited by AT&T does not and cannot take place. Thus, under the AT&T proposal, on the trunk side, the Commission would be imposing the provisioning of a preassembled, existing combination of two or more distinct elements, switching and interoffice transport, unadorned by even the fiction of remote access and electronic "deactivation"/"activation." It is hard to imagine a more clear violation of Iowa Utilities Board and Section 251(c)(3).

^{4/} Third Order on Reconsideration and Further Notice of Proposed Rulemaking, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, 12 FCC Rcd. 12460 (Aug. 18, 1997).

III. Collocation Is Consistent With Iowa Utilities Board

The DOJ appears to believe that Iowa Utilities Board somehow requires incumbent LECs to provide requesting carriers with direct physical access to the incumbent's network and relieves requesting carriers of the need to provide equipment necessary to access unbundled network elements. In the BellSouth South Carolina 271 Order, the Commission did not decide whether collocation was an acceptable method of providing access to unbundled network elements to allow a requesting carrier to combine such elements. The Commission explained: "we are still evaluating the implications of these rulings [in Iowa Utilities Board] and whether they may compel a result that would require methods other than, or in addition to, collocation for combining network elements." BellSouth South Carolina 271 Order at ¶199. As discussed below, nothing in Iowa Utilities Board supports the DOJ's misreading or is inconsistent with the Commission's original conclusion that collocation is the only method of obtaining access to unbundled network elements at the incumbent's premises.

In overturning the Commission's rules that required incumbents, rather than requesting carriers, to combine unbundled network elements, the Eighth Circuit held in Iowa Utilities Board:

Despite the Commission's arguments, the plain meaning of the Act indicates that the requesting carriers will combine the unbundled network elements themselves. . . . Moreover, the fact that incumbent LECs object to this rule indicates to us that they would rather allow entrants access to their networks than have to rebundle the elements for them. 120 F.3d at 813. (Emphasis added.)

This passage, however, must be read in light of Congress' directive in § 251(c)(6) that incumbent LECs are to provide requesting carriers with access to unbundled network elements through collocation if access is requested "at the premise" of the incumbent. Indeed, nothing in

the Eighth Circuit's passage suggests that the Eighth Circuit was nullifying § 251(c)(6) (even assuming that it could properly do so). To the extent that "access to their network" refers to accessing unbundled network elements at the incumbent's premises, then the only statutorily authorized method of access is collocation as provided for in § 251(c)(6). The Eighth Circuit's ruling certainly does not change that result — either expressly or by implication.

In approving the so-called "all elements" rule, the Eighth Circuit also held:

We now decide merely that under subsection 251(c)(3) a requesting carrier is entitled to gain access to all of the unbundled elements that, when combined by the requesting carrier, are sufficient to enable the requesting carrier to provide telecommunications service. 120 F.3d at 815.

This is one of the issues pending before the United States Supreme Court in its review of Iowa Utilities Board. Cross-petitioners in that pending proceeding, including Ameritech, contend that the "all elements rule" destroys the statutory distinction between unbundled network elements and resale. Even putting aside this dispute, however, the Eighth Circuit's ruling that a requesting carrier is entitled to "gain access to all of the unbundled elements" is in no way inconsistent with the Commission's original conclusion that collocation is an (and, in fact, the only) acceptable method of obtaining "access" if such access occurs at the incumbent's premises.

While the DOJ apparently believes that the "equipment necessary for . . . access to unbundled network elements" that may be collocated at the incumbent's premises pursuant to § 251(c)(6) is somehow at odds with the Eighth Circuit's conclusion that a competing carrier can gain access to "all of the unbundled elements" needed to provide a service, no such inconsistency exists. The requesting carrier's equipment needed to gain access to a network element is not itself a network element. Network elements are facilities and equipment owned by the incumbent. Equipment which is "necessary to access" a network element, and which is

physically located in the requesting carrier's collocation area in an incumbent's central office, is neither owned nor controlled by the incumbent. Rather, as the Commission itself has recognized: "generally, the only equipment used for . . . access to unbundled elements is the cross-connect equipment." First Report And Order at ¶ 581, fn. 1417. Cross-connect equipment that is owned and controlled by the requesting carrier is not a network element, and therefore, is not inconsistent with the Eighth Circuit's affirmance of the Commission's "all element rule."

CONCLUSION

For the foregoing reasons, the Commission should reject the positions taken by the DOJ, which attempt to improperly raise the bar that Congress has already fixed by statute. Indeed, with respect to the DOJ's argument on combining network elements, the statute and the pertinent case law cannot be more clear: network elements are to be provided on an unbundled basis and collocation is the only authorized method of accessing and combining such elements at the incumbent's premises. The Commission, therefore, must reject the DOJ's (as well as AT&T and MCI's) position on that issue, as well as the other issues addressed herein.

Respectfully submitted,

AMERITECH CORPORATION

By: Theodore A. Livingston / SSB
One of its Attorneys

Kelly R. Welsh
John T. Lenahan
AMERITECH CORPORATION
30 South Wacker Drive
Chicago, IL 60606
(312) 750-5000

Theodore A. Livingston
John E. Muench
Christian F. Binnig
MAYER, BROWN & PLATT
190 South LaSalle Street
Chicago, IL 60603
(312) 782-0600

CERTIFICATE OF SERVICE

I, Shalini Soni Bhagat, hereby certify that on this 28th day of August, 1998, I caused true and correct copies of the foregoing REPLY COMMENTS OF AMERITECH ON SECOND APPLICATION BY BELLSOUTH TO PROVIDE IN-REGION, INTERLATA SERVICES IN LOUISIANA to be served by hand delivery, overnight courier or U.S. mail (first-class postage pre-paid) on the following:

Office of the Secretary *
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554
Original, eleven copies and 3.5" disk

Janice Myles *
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554
Five copies

Carol Maltey *
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

William Agee *
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, D.C. 20554

Donald J. Russell *
Department of Justice
Telecommunications Task Force
Antitrust Division
Room 8205
555 Fourth Street, N.W.
Washington, D.C. 20001

ITS, Inc. *
1231 20th Street, N.W.
Washington, D.C. 20036

Lawrence C. St. Blank, Secretary **
Louisiana Public Service Commission
Post Office Box 91154
Baton Rouge, Louisiana 70821

Michael K. Kellogg, Esq.
Kellogg, Huber, Hansen, Todd & Evans
1301 K Street, N.W.
Suite 1000 - West
Washington, D.C. 20005

Jennings Bryant
Chair, APT Board of Directors
Alliance for Public Technology
901 15th Street, N.W.
Suite 230
Washington, D.C. 20005

Sheldon Elliot Steinbach
Vice President and General Counsel
American Council on Education
One Dupont Circle, N.W.
Washington, D.C. 20036

Richard J. Metzger
Association for Local Telecommunications
Services
888 17th Street, N.W.
Suite 900
Washington, D.C. 20006

David W. Carpenter
Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006
Counsel for AT&T

John Windhausen, Jr.,
General Counsel
Competition Policy Institute
1156 15th Street, N.W.
Suite 520
Washington, D.C. 20005

Danny E. Adams
Kelley Drye & Warren LLP
1200 19th Street, N.W.
Suite 500
Washington, D.C. 20036
*Counsel for Competitive
Telecommunications Association*

Laura H. Phillips
Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036
Counsel for Cox Communications, Inc.

Brad E. Mutschelknaus
Kelly Drye & Warren LLP
1200 19th Street, N.W.
Fifth Floor
Washington, D.C. 20036
Counsel for e.spire Communications, Inc.

Dana Frix
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Counsel for Exel Telecommunications, Inc.

Dana Frix
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
*Counsel for Hyperion Telecommunications,
Inc.*

Jonathan E. Canis
Kelley Drye & Warren, LLP
1200 19th Street, N.W.
Fifth Floor
Washington, D.C. 20036
*Counsel for Intermedia
Telecommunications, Inc.*

Angela Ledford
Executive Director
Keep America Connected
P.O. Box 27911
Washington, D.C. 20005

Mary C. Albert
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007
Counsel for KMC Telecom, Inc.

Robert E. Litan
The Brookings Institution
1775 Massachusetts Ave., N.W.
Washington, D.C. 20036

Roger G. Noll
Professor of Economics
Stanford University
Stanford, CA 94305

Jerome L. Epstein
Jenner & Block
601 13th Street, N.W.
Washington D.C. 20005
Counsel for MCI Telecommunications Corporation

Kim Robert Scovill, Esq.
Vice President - Regulatory Affairs
OmniCall, Inc.
430 Woodruff Road
Suite 450
Greenville, S.C. 29607

Robert L. Hoggarth, Esq.
Paging and Messaging Alliance of the
Personal Communications Industry
Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314

Harold Mordkofsky
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W. - Suite 300
Washington, D.C. 20037
Counsel for Radiofone, Inc.

Philip L. Verveer
Willkie, Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036
Counsel for Sprint Communications Company, L.P.

Dana Frix
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Counsel for State Communications, Inc.

Charles C. Hunter
Hunter Communications Law Group
1620 I Street N.W.
Suite 701
Washington, D.C. 20006
Counsel for Telecommunications Resellers Association

Brian Conboy
Willkie Farr & Gallagher
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20036
Counsel for Time Warner Telecom

Walter L. Purdy
Executive Director
Triangle Coalition for Science and
Technology Education
5112 Berwyn Road
College Park, MD 20740

John L. Traylor
Suite 700
1020 19th Street, N.W.
Washington, D.C. 20036
Counsel for US WEST Communications, Inc.

Andrew D. Lipman
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Counsel for WorldCom, Inc.

*Via Hand Delivery
**Via Overnight Courier

Shalini

Shalini Soni Bhagat